

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DANNY R. TEAGLE, individually)
and on behalf of all others similarly)
situated,)

Plaintiff,)

v.)

LEXISNEXIS SCREENING)
SOLUTIONS, INC., formerly known)
as CHOICEPOINT'S WORKPLACE)
SOLUTIONS, INC.,)
and)
IGLOO PRODUCTS CORP.,)

Defendants.)

CIVIL ACTION NO.

1:11-cv-01280-RWS-CCH

**DEFENDANT IGLOO PRODUCTS CORP.'S MOTION FOR JUDGMENT
ON THE PLEADINGS AS TO PLAINTIFF'S CLASS CLAIMS**

Defendant Igloo Products Corp. ("Igloo"), by and through its undersigned counsel, hereby files this Motion for Judgment on the Pleadings as to Plaintiff's Class Claims. As set forth in detail in the supporting memorandum of law, filed contemporaneously herewith, Plaintiff's class claims fail to state a claim upon which relief can be granted. Plaintiff has not provided any evidence suggesting that the facts alleged in support of his individual claim are common to any other individual, much less the entire class he proposes to represent. Additionally,

Plaintiff failed to meet the deadline specified by the Court pursuant to Local Rule 23.1 to move for certification of the class claims, and, therefore the class claims are, in essence, time-barred. Accordingly, Igloo respectfully requests that this Court enter an order granting Igloo judgment on the pleadings as to the class claims that have been asserted against it.

Respectfully submitted this 31st day of August, 2011.

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FONT CERTIFICATION

The undersigned hereby certifies that this pleading complies with the font requirements of LR 5.1B because the document has been prepared in Times New Roman, 14 point.

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